UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

Plaintiff and Counterclaim Defendant,))	
<i>)</i>	
V.)	366
QUINTESSA MARKETING LLC,) Cause No. 4:20-CV-12	233
) Division No.	
Defendant and Counterclaim Plaintiff.)	
)	

MOTION TO AMEND/EXTEND SCHEDULING ORDER

COMES NOW Plaintiff, ERB LEGAL INVESTMENTS LLC, by and through attorney

E. Ryan Bradley of The Bradley Law Firm and for the Motion to Amend/Extend Scheduling

Order states as follows to the Court:

- 1. The instant cause of action, <u>ERB Legal Investments</u>, <u>LLC v. Quintessa</u>

 <u>Marketing</u>, <u>LLC</u>, was removed to this Court from the Circuit Court of St. Louis, Missouri on September 15, 2020.
- 2. Thereafter, the Court entered a case management order [Doc 31] on November 30, 2020.
- 3. Thereafter, Quintessa LLC d/b/a Quintessa Marketing v. ERB Legal Investments, LLC d/b/a The Bradley Law Firm, Case No.4:21-CV-19 DDN was transferred to this Court and consolidated with this cause of action on February 23, 2021.

- 4. Due to the consolidation of the cases several of the scheduling deadlines from the scheduling order have expired and are not workable considering the posture of the consolidated cases.
- 5. As such, Plaintiff requests the Court all the parties to amend the current scheduling order for all deadlines.

WHEREFORE, Plaintiff prays for this Court to Order the parties to submit a new scheduling order within fourteen (14) days and for any such other and further relief as this Court deems appropriate under the circumstances.

Respectfully submitted,

By: <u>/s/E. Ryan Bradley</u>

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 27, 2021, I electronically filed the foregoing Certificate of Service with the Clerk of the Court using the <u>Courts E-Filing System</u> which was sent notification of such filing to all counsel of record. I further certify that I signed, or caused my electronic signature to be place upon the original of the foregoing documents and that a copy of the foregoing was sent via the Court's efiling system to.

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/s/E. Ryan Bradley